

REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful review of this application. Claims 52-92 remain pending. Applicants respectfully request reconsideration of the application in view of the following remarks submitted in support thereof.

Rejections under 35 U.S.C. §103(a):

The Examiner rejected claims 52-93 under 35 U.S.C. §103(a), as being unpatentable over US Patent 6,628,15B to Lawrence et al. (Lawrence) in view of US Patent 6,389,589B1 to Mishra et al. (Mishra). Applicants respectfully traverse each and every rejection for at least the following reasons.

Citing Lawrence, the Examiner asserts that Lawrence discloses a system and method for device management in a grouped server system comprising a plurality of servers operating in a group and a plurality of set top units. In fact, there is nothing in Lawrence that suggests a grouped server system. Lawrence teaches attaching a printer locally to a set top box. What Lawrence is trying to accomplish is to attach a printer locally to the set top box without having to pre-install printer drivers for several printers.

According to Lawrence, the printer drivers for the attached printer are obtained from the cable head end on the digital cable network in response to a request from the set top box (Column 2, lines 41-45). The cable head end collects value added services to be distributed over the digital cable network. The cable head end also implements the network control systems, which handle the distribution and control of the aforementioned services. Moreover, the cable head end on a typical digital cable network may provide services to one-half to one million homes by distribution over the digital cable network (Column 1, lines 32-40). The cable head end in Lawrence collects the information, i.e. different printer drivers,

and provides it to the set top box so that memory space in the set top box can be freed.

Lawrence describes the cable head end as the server and the set top box as the client (Column 6, lines 51-53). If the Examiner's assertion was correct, then at the time when the cable head end receives a request for a printer driver, the cable head end should be able to pass the request to another cable head end if the requested cable head does not have the requested printer driver. The cable head end serves as an interface between the service providers and the rest of the broadband network.

In contrast, the claimed invention defines a method for device management in a grouped server system where device operations remain uninterrupted when a server fails. In the present invention, a plurality of servers act as a group. Specifically, the present invention provides a device manager on a server to interface a device service on the server with a peripheral device connected to a desktop unit to control and use the peripheral device. To make the control and use of the peripheral device without any interruption due to server failure, the present invention provides a plurality of device managers located in a plurality of servers that act as a group. For example, a request for control of the peripheral device can be presented to a first device manager in a first server. The device service can also be located on the first server. In the event of a failure of the first device manager or an inability of the first device manager to interface the device service with the proper peripheral device, the control request is transferred to a second device manager in a second server. The second device manager then allocates the proper peripheral device to be controlled by the requesting device service. Thus, the present invention provides a plurality of device managers for interfacing or brokering device services on the servers with peripheral devices on the desktop units in a grouped server environment without any single point of failure.

Moreover, the Examiner compared the set top box in Lawrence to the thin client in the claimed invention. This comparison is misplaced because the medium for communication between the client (set top box) and the server (cable head end) is limited to a digital cable network because set top boxes are used for connecting a television to the digital cable network. The set top boxes are incapable of being connected to the servers on the web without the intermediary i.e. the cable head end. Each set top box is only connected to one cable head end i.e. the server (see FIG.1). Therefore, the cable head ends in Lawrence is not working in group like the servers of the claimed invention. Therefore, if one of the cable head end fails, the set top box will not be able to get printer drivers through other cable head ends.

The next reference Mishra teaches a computer network with centralized management and deployment of applications. The computer network in Mishra includes centralized class stores such that applications and components are made centrally available so that updates to components or applications are performed once in a centralized location, whereby users may automatically obtain new versions of applications as they become available. Moreover, Mishra does not mention about a number of servers functioning as a group in order to provide uninterrupted device operation when a server fails. In Mishra, if the server which contains the centralized class store fails, then the users do not have any other recourse. As a result, the combination of Lawrence and Mishra would not have taught device management in a grouped server system wherein the request gets transferred from one server to the other to provide uninterrupted device operations.

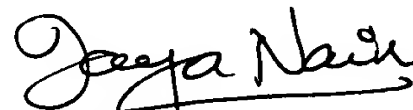
Therefore, it is respectfully submitted that independent claims 52 and 82 are patentable under 35 U.S.C. §103(a) over any combination of the cited prior art. In a like manner, dependent claims 53, 68, 69, 73, 74 82, 87, 92, and 93, which depend directly or

indirectly from independent claims 52 and 82, are patentable over Lawrence alone or in combination with Mishra. Similarly, claims 54-56, 78-81, and 89-91 are patentable over Lawrence in view of Mishra at least for the same reasons stated above. Likewise, claims 57-61 and 83-85, which depend directly or indirectly from independent claims 52 and 82, are patentable.

Conclusion

In view of the foregoing, the Applicants respectfully submit that all the pending claims 52-92 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 774-6926. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP581). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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